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*Attorneys for Alberto Lensi and
Trans-American Films
International Corporation*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MARK DISALLE, an individual,

Plaintiff,

v.

ALBERTO LENSI, an individual;
TRANS-AMERICAN FILMS
INTERNATIONAL
CORPORATION, a Delaware
corporation, and DOES 1-10,

Defendants.

Case No. 22-cv-02152-SSS-PVCx

**JOINT STIPULATION
REGARDING MODIFICATION OF
TRIAL AND PRETRIAL DATES**

District Judge: Hon. Sunshine S. Skyes
Magistrate Judge: Hon. Pedro V.
Castillo

STIPULATION

Plaintiff Mark DiSalle and Defendants and Counterclaimants Alberto Lensi and Trans-American Films International Corporation (collectively, the “Parties”) stipulate as follows:

WHEREAS, the Court issued its Civil Trial Order Setting Pretrial and Trial Dates on September 14, 2022. Dkt. 46.

WHEREAS, the Court issued an Amended Schedule of Pretrial and Trial Dates at the Parties’ request on June 20, 2023, Dkt. 73, which continued: (1) the last day to hear motions to December 15, 2023; (2) the deadline to complete settlement conference to January 5, 2024; (3) the deadline for filing motions in limine to January 19, 2024 and the deadline for filing oppositions to motions in limine to February 2, 2024; (4) the deadline for trial filings (first round) to February 2, 2024, and the deadline for filing trial filings (second round) to February 16, 2024; (5) the hearings on motions in limine to February 23, 2024; (6) the Final Pretrial Conference [L.R. 16] to March 1, 2024; and (7) the trial date to March 18, 2024.

WHEREAS, the Court, *sua sponte* continued the date set for hearing Plaintiff’s Motion for Summary Judgment and Defendant’s Motion for Leave to File Sur-Reply from December 15, 2023 at 2:00 p.m. to January 5, 2024, at 2:00 p.m. Dkt. 86.

WHEREAS, on January 5, 2024, Plaintiff’s counsel Marc Toberoff will be in British Columbia, Canada on a pre-planned and pre-paid family holiday.

WHEREAS, given this scheduling conflict, the Parties have agreed to continue the hearing date, and pending trial and pre-trial dates, subject to approval of the Court;

WHEREAS, counsel for Defendants is out of town on a previously scheduled work trip on January 12, 2024, then on January 19, 2024 counsel for Defendants is out of the country on a trip to meet counsel for Defendants’ family

1 for his birthday and on January 26, 2024, counsel for Defendants is out of town
2 on a previously scheduled work trip. All three of these trips were scheduled last
3 summer or earlier. The earliest available date that Defendants' counsel would
4 be available for the hearing on the motions for summary judgment is February 2,
5 2024;

6 **WHEREAS**, the Parties have engaged in ongoing settlement discussions
7 and believe that the requested extension will help further a potential settlement
8 of this case;

9 **WHEREAS**, the requested schedule modifications will facilitate the
10 overall progress and efficient progression of the case; and

11 **WHEREAS**, pursuant to the Court's Civil Trial Order, a Proposed Order
12 Granting Continuance and Proposed Amended Schedule of Trial and Pretrial
13 Dates, utilizing the Court's template, is filed concurrently herewith.

14 Based on the foregoing, **IT IS HEREBY STIPULATED** by and between
15 the Parties, through their respective counsel of record, subject to the Court's
16 approval that the following modifications be made to the schedule:

- 17 1. The deadline to complete a settlement conference is continued to
18 March 22, 2024.
- 19 3. The deadline for filing motions in limine is continued to April 5, 2024
20 and the deadline for filing opposition to motions in limine is continued
21 to April 19, 2024.
- 22 4. The deadline for trial filings (first round) is continued to April 19,
23 2024, and the deadline for filing trial filings (second round) is
24 continued to May 3, 2024.
- 25 5. The hearings on motions in limine is continued to April 26, 2024.
- 26 6. The Final Pretrial Conference [L.R. 16] is continued to May 17, 2024.
- 27 7. The trial date is continued to June 3, 2024.

1 Date: December 14, 2023

TOBEROFF & ASSOCIATES, P.C.

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3 By: /s/ Marc Toberoff
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9 *Attorneys for Plaintiff*

10
11 Date: December 14, 2023

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19 *Attorneys for Alberto Lensi and Trans-*
20 *American Films International*
21 *Corporation*

SIGNATURE ATTESTATION

Pursuant to CACD Local Rule 5-4.3.4(a)(2)(i), I certify that I have obtained authorization to file this document from the other signatories to this document and that all other signatories have authorized placement of their electronic signature on this document.

Date: December 14, 2023

TOBEROFF & ASSOCIATES, P.C.

By: /s/ Marc Toberoff
Marc Toberoff

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Attorneys for Plaintiff